

In the Supreme Court of the United States

CITY OF NEW YORK, NEW YORK, ET AL.,

Petitioners,

v.

JARRETT FROST,

Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that Respondent's Brief in Opposition in *City of New York, New York, et al. v. Jarrett Frost*, S. Ct. No. 20-1788, complies with the word limitations, because it contains 8994 words, excluding the parts of the document exempted by Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 29, 2021



Shay Dvoretzky

